## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA PHILADELPHIA DIVISION

	) CASE NO. 15-12372-jkt
In re:	)
	) JUDGE Jean K. FitzSimon
Diane Turner	)
	) CHAPTER: 13
Debtor.	)
	)
	)
	)
	)

THE BANK OF NEW YORK MELLON F/K/A THE BANK OF NEW YORK AS SUCCESSOR IN INTEREST TO JP MORGAN CHASE BANK, N.A. AS TRUSTEE FOR STRUCTURED ASSET MORTGAGE INVESTMENTS II TRUST 2006-AR3 MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2006-AR3 NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Now comes Creditor THE BANK OF NEW YORK MELLON F/K/A THE BANK OF NEW YORK AS SUCCESSOR IN INTEREST TO JP MORGAN CHASE BANK, N.A. AS TRUSTEE FOR STRUCTURED ASSET MORTGAGE INVESTMENTS II TRUST 2006-AR3 MORTGAGE PASS-THROUGH CERTIFICATES SERIES 2006-AR3 ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 09/01/2020. Creditor holds a secured interest in real property commonly known as 236 Gwynedd Avenue North Wales, Pennsylvania 19454 as evidenced by

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claim number 5-1 on the Court's claim register. Creditor, at this time, does not waive any rights

to collect the payments that come due during the forbearance period. If the Debtor desires to

modify the length of the forbearance period or make arrangements to care for the forbearance

period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests

through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 10/01/2020 and will

be required to cure the delinquency created by the forbearance period (hereinafter "forbearance

arrears"). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding

the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor

fails to make arrangements to fully cure the forbearance arrears, Creditor reserves it rights to seek

relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid & Crane LLC Authorized Agent for Secured Creditor

10700 Abbott's Bridge Road, Suite 170

Duluth, GA 30097

Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab Charles G. Wohlrab, Esquire Email: cwohlrab@rascrane.com

## **CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* was served upon the following parties in the following fashion on this 18th day of May 2020.:

Diane Turner 1060 Redtail Road Audubon, PA 1940

And via electronic mail to:

WAVERLEY MADDEN Law Office of Waverley Madden 100 S. Broad Street Suite 1355 Philadelphia, PA 19110

WILLIAM MILLER\*R Interim Chapter 13 Trustee 2901 St. Lawrence Avenue, Suite 100 Reading, PA 19606

SCOTT F. WATERMAN (Chapter 13) Chapter 13 Trustee 2901 St. Lawrence Ave. Suite 100 Reading, PA 19606

United States Trustee Office of the U.S. Trustee 200 Chestnut Street Suite 502 Philadelphia, PA 19106

> Robertson, Anschutz, Schneid & Crane LLC Authorized Agent for Secured Creditor 10700 Abbott's Bridge Road, Suite 170 Duluth, GA 30097 Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab Charles G. Wohlrab, Esquire Email: cwohlrab@rascrane.com